

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter Of)	
)	
Protecting and Promoting the Open Internet)	GN Docket No. 14-28
)	
)	

To: The Commission

COMMENTS ON PROPOSED RULEMAKING

The National Association of Manufacturers ("NAM") hereby comments on the notice of proposed rulemaking on Protecting and Promoting the Open Internet, GN Docket No. 14-28.

The NAM is the largest manufacturing association in the United States, representing small and large manufacturers in every industrial sector and in all 50 states. Manufacturing employs nearly 12 million men and women, contributes more than \$2.08 trillion to the U.S. economy annually, has the largest economic impact of any major sector, and accounts for two-thirds of private-sector research and development. The NAM is the powerful voice of the manufacturing community and the leading advocate for a policy agenda that helps manufacturers compete in the global economy and create jobs across the United States. The NAM has a significant interest in, and can offer a unique perspective on, the issues raised by the Federal Communications Commission (the "Commission").

Manufacturers in the United States are the beneficiaries of a globally deployed broadband infrastructure, which has transformed the way they operate and offered them

numerous opportunities to participate in the creation and deployment of next generation products and services. Manufacturers have also become increasingly dependent on the Internet and advanced telecommunication services in their daily operations to connect with customers, employees, suppliers, and valued partners. Specifically, manufacturers use telecommunications services and related technology to track production and inventory, to provide online learning tools to employees, and to assist all aspects of customer service operations from ordering to final delivery of a product. For these services and the systems on which they run, networks need to be robust and reliable to benefit manufacturers and consumers alike.

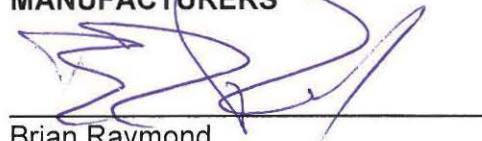
This utilization of the Internet and broadband technology in the products and processes of manufacturers has contributed significantly to the growth of the manufacturing sector in the United States. The NAM and all manufacturers are therefore strongly supportive of an open Internet and have communicated extensively to the Commission, Congress, and the courts the need to keep it free from burdensome regulation. The NAM is concerned that the Commission's current attempt to unnecessarily regulate the Internet with early 20th Century-era laws will lead to a slowdown in innovation coming out of the manufacturing sector and effectively chill investment in future technologies.

The proposed reclassification of broadband Internet services as a utility under Title II of the Communications Act and the proposed regulation of those services under section 706 of the Telecommunications Act of 1996 being considered by the Commission will impose those unnecessary burdens on manufacturers in the United States. It will therefore harm American consumers, prevent the creation of new jobs, and stifle the rollout of high-speed services to unserved and underserved areas where NAM members invest and grow their businesses.

The NAM therefore does not support the proposed rulemaking and urges the Commission to recognize that the recent decision by the D.C. Circuit does not provide it with the authority to regulate the Internet and the Commission should therefore defer to Congress to determine if and how the Internet should be regulated.

Respectfully submitted,

**NATIONAL ASSOCIATION OF
MANUFACTURERS**



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July 15, 2014